



# LOCAL UNION No. 77

International Brotherhood of Electrical Workers



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Dear Washington Utility and Transportation Commissioners:

My name is Mike Brown. I am the Assistant Business Manager for Local 77 of the International Brotherhood of Electrical Workers (IBEW). IBEW Local 77 is a Labor Organization based out of SeaTac, WA with satellite offices located in Kennewick, WA and Spokane, WA. IBEW Local 77 represents 8300 workers in the state of Washington, Northern Idaho, and Northwest Montana in the Utility industry and Powerline Construction and Maintenance industry. We currently have a Collective Bargaining Agreement that originated in 1940 with Avista Utilities located in Spokane, WA representing approximately 650 of Avista's employees. Among the classifications within Avista that we represent are Journeyman Lineman, Hydro Operators, Hydro Mechanics, Electricians, Metering and Relays, Fleet, Warehouse, Facilities, Gas Main-Fitters, Gas Serviceman, and Gas Meterman.

Recently, Avista came into an agreement with Washington and Northern Idaho District Council of Laborers (WNIDCL) out of settlement as an intervener of docket UE-170970 in front of the Washington Utilities and Transportation Commission (WUTC). This docket was for consideration for the Hydro One acquisition of Avista Corporation. Our Local Union received knowledge of this agreement and would like to present an official statement in opposition to this settlement agreement before the Commission. WNIDCL went on record that their interest was to provide a trained and safe workforce to the benefit of the consumer and the public. Although this is an interest to all in the industry, we do not believe that the parties entering into this agreement will produce the outcome that would satisfy the consumer, the public, or the Commission.

IBEW 77 has represented Gas workers for Avista since 1959. The Joint Apprenticeship Training Committee (JATC) was established in 1949 between the Union and the Company. This JATC has 11 apprenticeships, 3 of which are in the Gas department of the Utility. There is a large difference between the definitions of training and apprenticeships. Some entities may be able to provide training, but we offer training and apprenticeships. Having established programs and apprenticeships that are registered through the Department of Labor of the United States, gives the education, on-the-job training, and credentials of a skilled worker that is beneficial to the consumer, the public, and the Commission. We have evidence and testimony to the quality of work performed by contractors who have not had the same level of training.

Therefore, this argument of the level of training received by other entities without the time spent in a credited apprenticeship and on-the-job training, becomes a safety concern to the consumer, the public, and the employees of Avista Utilities. Employees of Avista, IBEW's members, and the employees of

contractors can be compromised if adequate training and on-the-job experience is not provided. WNIDCL may argue that all employees working on Gas Pipeline infrastructure must be Operator Qualified in accordance with the Pipeline Hazardous Materials Safety Administration (PHMSA) and that their employees have been qualified. Although this may be true to an extent, there has also been evidence to show that Contractors for Avista Utilities have not met the requirements set forth by PHMSA and have falsified documents pertaining to Operator Qualifications. The definitions of these types of qualifications and types of tasks needed to be qualified are outlined within the requirements of PHMSA's regulations. The apprenticeships that Avista and the IBEW provide, enhance the experience of the worker for these Operator Qualifications.

The safe maintenance of gas pipeline infrastructure requires work performed by a variety of crafts, including pipefitters, operating engineers, electricians and laborers. For the Laborers to have leveraged their own separate deal negotiated in secret with the exclusion of all other crafts that are involved in the work is pure opportunism and does not serve the public well. While the Laborers want this agreement for their own benefit, the agreement does not benefit the public or the rate payers. Instead, the agreement has the potential to exclude trades that traditionally perform important work related to gas pipeline infrastructure and to require the use of Laborers to perform work not historically performed by their trade. The Commission should not let their process be hijacked by an opportunistic labor organization. A contrary outcome will result in other labor unions engaging in similar tactics in future matters before the Commission.

Through this public statement, IBEW Local 77 asks the WUTC to reconsider its approval of the mentioned docket. The agreement between Avista Corporation and WNIDCL is not beneficial to the integrity of the infrastructure of Avista's system, the consumer, the public, or any worker involved.

Respectfully Submitted,



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Assistant Business Manager

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cc: Louis R. Walter, Business Manager